

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

TRANSDATA, INC.,

Plaintiff,

vs.

CENTERPOINT ENERGY HOUSTON
ELECTRIC, LLC, *et al.*,

Defendants.

CIVIL ACTION NO. 6:10-cv-557 (Lead Case)

CIVIL ACTION NO. 6:16-cv-407

JURY TRIAL DEMANDED

JOINT MOTION TO ENTER AMENDED STIPULATED PROTECTIVE ORDER

The undersigned counsel for Plaintiff TransData, Inc. and Defendant CenterPoint Energy Houston Electric, LLC hereby respectfully request the Court to enter the attached Amended Stipulated Protective Order in this matter. *See* Exhibit A. The Amended Stipulated Protective Order contains the amendment described in Docket 230 that the Court approved at the Pretrial Conference in this case on June 30, 2016, modifying the definition of “Outside Counsel.”

The proposed Amended Stipulated Protective Order is the same Protective Order entered by Judge Cauthron in the related MDL proceeding.¹

Wherefore Plaintiff and Defendants respectfully request that the attached Amended Stipulated Protective Order be entered in this case.

¹ *See In Re: TransData, Inc. Smart Meters Patent Litigation*, No. 5:12-ML-2309-C, Dkt. No. 178 (W.D. Okla.).

Dated: July 8, 2016

Respectfully submitted,

*/s/ Jamie McDole with permission
by Michael E. Jones*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on July 8, 2016.

/s/ Michael E. Jones